

# KITCHEN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CR. NO. 11-20192-JPM
	)	
vs.	)	21 U.S.C. § 846
	)	21 U.S.C. § 841(a)(1)
VERNON TAYLOR,	)	21 U.S.C. § 843(b)
ANDRE DUGGER,	)	18 U.S.C. § 2
MARLON DAWSON,	)	18 U.S.C. § 4
MICHAEL GARY,	)	
TONY STEPHENSON,	)	
HERMAN YOUNG,	)	
RODERICK MATHIS,	)	
JAMES BOWENS,	)	
QUINTON SYKES,	)	
BARRY COLLIER,	)	
EARL BRADEN,	)	
LARRY JOHNSON,	)	
RICHARD BELL, III,	)	
JOHNSON McBRIDE,	)	
PATRICK ARMSTRONG,	)	
CURTIS BROWN,	)	
MARTIN PERRY,	)	
BRANDON TAYLOR,	)	
LADELDRICK MOORE,	)	
DANIEL GALLEGOS,	)	
CARMELO ESTRADA,	)	
JONATHAN FOSTER,	)	
HERBERT BYERS,	)	
DEMARIO CLEAVES,	)	
ERIC JOHNSON, and	)	
ROLAND H. RAMOS,	)	
	)	
Defendants.	)	

**SECOND SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

Beginning at a time unknown to the grand jury, but at least from in or about October of 2010 and continuing until in or about July of 2011, in the Western District of Tennessee, the defendants,

-----VERNON TAYLOR,-----  
 -----ANDRE DUGGER,-----  
 -----MARLON DAWSON,-----  
 -----MICHAEL GARY,-----  
 -----TONY STEPHENSON,-----  
 -----HERMAN YOUNG,-----  
 -----RODERICK MATHIS,-----  
 -----JAMES BOWENS,-----  
 -----QUINTON SYKES,-----  
 -----BARRY COLLIER,-----  
 -----EARL BRADEN,-----  
 -----LARRY JOHNSON,-----  
 -----RICHARD BELL, III,-----  
 -----JOHNSON McBRIDE-----  
 -----PATRICK ARMSTRONG,-----  
 -----CURTIS BROWN,-----  
 -----MARTIN PERRY,-----  
 -----BRANDON TAYLOR,-----  
 -----LADELDRICK MOORE,-----  
 -----DANIEL GALLEGOS,-----  
 -----CARMELO ESTRADA,-----  
 -----JONATHAN FOSTER,-----  
 -----HERBERT BYERS,-----  
 -----DEMARIO CLEAVES,-----  
 -----ERIC JOHNSON-----  
 -----and-----  
 -----ROLAND H. RAMOS-----

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, to possess with the intent to distribute at least one thousand kilograms of a mixture and substance containing a detectable amount of marijuana, a controlled substance as classified by Title 21, United States Code, Section 812, as a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.

[nlt 10 yrs, nmt life, plus \$4,000,000 fine, plus 5 yrs. supervised release (or, after a prior drug felony conviction, nlt 20 yrs, nmt life, plus \$8,000,000 fine, plus 10 yrs. supervised release), together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**COUNT TWO**

On or about April 8, 2010, in the Western District of Tennessee, the defendant,

-----**PATRICK ARMSTRONG**-----

did unlawfully, knowingly and intentionally possess with intent to distribute fifty grams of a mixture and substance containing a detectable amount of Methamphetamine, classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

[nlt 5 yrs, nmt 40 yrs, nmt \$2,000,000 fine or both, and nlt 4 yrs supervised release, and if previously convicted nlt 10 yrs, nmt life, nmt \$4,000,000 or both, and nlt 8 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**COUNT THREE**

On or about April 8, 2011, in the Western District of Tennessee, the defendants,

-----**VERNON TAYLOR**-----  
-----and-----  
-----**ERIC JOHNSON**-----

each aided and abetted by the other, did knowingly and intentionally use a communication facility, namely a telephone in the possession of **ERIC JOHNSON**, in committing and in causing and facilitating the commission of the distribution of controlled substances, as classified by Title 21, United States Code, Section 812 as a Schedule I controlled substances, constituting a felony under Title 21, United States Code, Section 841(a)(1), and conspiring to distribute controlled substances, constituting a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

[nlt 4 yrs, nmt \$250,000 fine, or both; of the defendant has prior drug felony conviction, nmt 8 yrs., nmt \$250,000 fine; a term of at least 2 yrs. supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**COUNT FOUR**

Beginning at a time unknown to the grand jury, but at least from in or about October of 2010 and continuing until in or about July of 2011, in the Western District of Tennessee, the defendant,

-----**ERIC JOHNSON**-----

having knowledge of the actual commission of a felony cognizable by a Court of the United States, that is the conspiracy involving the distribution of and possession with intent to distribute at least one thousand kilograms of a mixture and substance containing a detectable amount of marijuana, did conceal and did not as soon as possible make known this fact to a judge or other person in civil or military authority under the United States, by not revealing his knowledge that Vernon Taylor, conspired to distribute and possessed with intent to distribute over one thousand kilograms of marijuana, in violation of 18 United States Code, Section 4.

[nmt 3 yrs, nmt \$250,000 fine, or both, together with a mandatory 3 yr term of supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

**DATED:** \_\_\_\_\_

\_\_\_\_\_  
**EDWARD L. STANTON, III**  
**UNITED STATES ATTORNEY**